



11452 El Camino Real
Suite 300
San Diego, CA 92130-2080

T +1.858.720.5700
F +1.858.720.5799
PerkinsCoie.com

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John D. Esterhay
JEsterhay@perkinscoie.com
D. +1.858.720.5758
F. +1.858.720.5858

VIA CM/ECF

Honorable Mark W. Pedersen
Western District of New York
Kenneth B. Keating Federal Building
100 State Street, Room 2330
Rochester, New York 14614

Re: ***ValveTech, Inc. v. Aerojet Rocketdyne, Inc.***
Case No.: 6:17-cv-06788-FPG-MWP

Dear Magistrate Judge Pedersen:

Pursuant to the Court's procedures for raising discovery disputes, and the December 18, 2020 Amended Scheduling Order which set both a February 12, 2021 deadline for close of fact discovery and a January 13, 2021 deadline for filing motions to compel discovery (Dkt. No. 149 ¶ 3), Plaintiff ValveTech submits this letter to inform the Court there are outstanding discovery issues that have not yet been resolved, including: (1) Defendant Aerojet has not yet provided any deposition dates for depositions noticed by ValveTech, including those compelled by the Court's October 16, 2020 Decision and Order (Dkt. No. 139); (2) Defendant Aerojet has not yet completed its document discovery production compelled by that order; and (3) ValveTech has timely served additional discovery to which Aerojet has not yet made an objection.

ValveTech hopes that these issues will be resolved through continuing discussions between counsel, but files this letter motion to both inform the Court of these issues, given the rapidly approaching close of fact discovery, and also to comply with the Court's deadline for motions to compel. ValveTech is willing and available to discuss any of these issues further with the Court if the Court requests, otherwise ValveTech would prefer to raise these issues further only after it is apparent no further negotiation with Aerojet is possible.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J. Esterhay".

John D. Esterhay

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cc: Counsel of record (via CM/ECF)